



O.E.P.A.
S.E.D.O.

CLOW WATER SYSTEMS COMPANY

2006 MAY -1 PM 12:39

2266 South Sixth Street
P.O. Box 6001
Coshocton, Ohio 43812
(740) 622-6651
FAX (740) 622-8551

April 28, 2006

Zach Hamlin
Division of Air Pollution Control
Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, Ohio 43138-9031

Director
Air and Radiation Division
USEPA Region 5
77 W. Jackson Blvd,
R-19J Chicago, Illinois 60604

Reference: Title V Certification Report

Dear Mr. Hamlin,

Enclosed is the Title V Certification Report filled out as required. If you have questions or need additional info please feel free to contact me.

W. Patrick Huth

Environmental Manager

O.E.P.A.
S.E.D.O.

2006 MAY -1 PM 12:39

Ohio EPA Use Only
Date Received:
Staff Reviewer:
Date Reviewed:

Compliance Certification Section I - Facility Information

Complete this section of the form only once for the facility (See "Compliance Certification Section IV" under the "Clarifying Instructions" at the end of this document for important additional information in filling out this part of the form.)

- A. Facility Name: Clow Water Systems Company
- B. Facility Address: 2266 South Sixth Street
- C. Facility ID [10 digits] : 06-16-01-0006
- D. Date of Title V Permit Issuance: 06/08/00
- E. Reporting Period (usually the preceding calendar year): 2005

Compliance Certification Section II - General Terms and Conditions (Part I of the Permit)

Complete this section of the form only once for the facility (See "Compliance Certification Section II" under the "Clarifying Instructions" at the end of this document for important additional information in filling out this part of the form)

- F. Has your company complied with all the General Terms and Conditions stated in Part I (A) of the Title V permit? X YES NO

If no, indicate the paragraph number for each General Term and Condition for which compliance was not maintained, a description of the excursion/deviation, and a description of the corrective action that was taken to ensure that compliance will be maintained in the future.

16.	It was determined that changes and modifications to equipment made in 1998 may have potentially constituted a modification under PSD and PTI rules.	Clow has conducted a comprehensive review to determine if the PSD and PTI modification requirements would have been triggered. Clow and Ohio EPA have entered in a Director's Final Findings and Orders to address any PSD/PTI issues. Clow has submitted appropriate applications to resolve outstanding issues and expects to receive appropriate permits from Ohio EPA in the near future.
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Compliance Certification Section III - Facility Terms and Conditions (Part II of the Permit)

Complete this section of the form only once for the facility (See "Compliance Certification Section III" under the "Clarifying Instructions" at the end of this document for important additional information in filling out this part of the form.)

- G. Provide for each term and condition in Part II.A "State and Federally Enforceable Section", by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Please place an "X" in only one of the two options below	
X	Each IEU listed in Part II.A of the Title V permit has complied with each applicable requirement established in the listed Permit To Install (PTI) and each applicable requirement specified in OAC Chapter 3745-17, OAC Chapter 3745-18, and/or OAC Chapter 3745-21.
	Except as indicated for each IEU listed in the following table below, each IEU listed in Part II.A of the Title V permit has complied with each applicable requirement established in the listed Permit To Install (PTI) and each applicable requirement specified in OAC Chapter 3745-17, OAC Chapter 3745-18, and/or OAC Chapter 3745-21. (Please identify each intermittent compliant IEU in a separate row in the table below as applicable.)

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance*	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
N/A	N/A	N/A	N/A	N/A

- H. Any other material information that may indicate non-compliance with one or more of the above-described applicable requirements for this facility must be described below:

None

Compliance Certification Section IV - Significant Emissions Units Terms and Conditions (Part III of the Permit)

Complete this section of the form for each significant emissions unit. Emissions units with identical terms and conditions may be grouped together (See "Compliance Certification Section IV" under the "Clarifying Instructions" at the end of this document for important additional information in filling out this part of the form.)

I. Significant Emissions Unit ID [4 characters]: F002

J. Provide for each term and condition in Part III.A "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a **brief** statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period. *Please add rows as necessary for each Emission Limitation/Control Measure specified in Part III.A.1.1 of the permit.*

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance*	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1. 0.03 gr/dscf or no visible emissions, whichever is less stringent	Emissions testing if required. Procedures specified in 40 CFR Part 60, Appendix A, Method 22.	C		
		C		
I.1. 16 tpy of particulate emissions	Multiplying the allowable particulate emission rate of 0.030 gr/dscf by the maximum flow rate of the control equipment for this emission unit, times the actual hours of operation during the calendar year, and then dividing by 2000 lbs/ton	C		
I.2.a. Fugitive emissions from the sand cooling drum shall be collected sufficiently to eliminate visible particulate emissions...	N/A	C		
I.2.b.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.1.	Records of daily checks are maintained on-site	C		
IV.1.	Copies of semi-annual reports are maintained on-site.	C		
V.1.	Copies of any required stack tests are maintained on-site.	C		

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V.2.	Copies of any required stack tests are maintained on-site.	C		
V.3.	Multiplying the allowable particulate emission rate of 0.030 gr/dscf by the maximum flow rate of the control equipment for this emission unit, times the actual hours of operation during the calendar year, and then dividing by 2000 lbs/ton	C		
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: F004

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: F006

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: F007

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: F008

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: F009

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?"	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: F010

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
I.2.b.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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- I. Significant Emissions Unit ID [4 characters]: F011
- J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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	Procedures specified in 40 CFR Part 60, Appendix A, Method 22.			
V.3.	Multiplying the allowable particulate emission rate of 0.030 gr/dscf by the maximum flow rate of the control equipment, times the actual hours of operation during the calendar year, and then divide by 2000 lbs/ton	C		
V.4.	One time calculation of the maximum tons of sand processed in this emission unit per hour, 5 tons/hour, multiplied by the VOC emission factor of 0.65 lb of VOC/ton of sand	C		
VI.	N/A	N/A	N/A	N/A

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- I. Significant Emissions Unit ID [4 characters]: F015
- J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: F016

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: F012

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: F014

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?"	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1. 9.75 tpy of VOC based upon a rolling, 12-month summation	Monthly calculation of pounds VOC per ton of sand emission factor multiplied by the tons of sand used, and divided by 2000 pounds per ton; added to the previous 11 months emissions in tons VOC	C		
I.1. Total particulate emissions shall not exceed 0.03 gr/dscf (0.46 lb/hr at maximum capacity) or no visible emissions, whichever is less stringent.	Emissions testing if required. Procedures specified in 40 CFR Part 60, Appendix A, Method 22.	C		
I.1. Total particulate emissions shall not exceed 2.03 tpy	Multiplying the allowable particulate emission rate of 0.030 gr/dscf by the maximum flow rate of the control equipment, times the actual hours of operation during the calendar year, and then divide by 2000 lbs/ton	C		
I.1. 3.25 lb/hr of VOC	One time calculation of the maximum tons of sand processed in this emission unit per hour, 5 tons/hour, multiplied by the VOC emission factor of 0.65 lb of VOC/ton of sand	C		
I.2.a.	Monthly calculation of pounds VOC per ton of sand emission factor multiplied by the tons of sand used, and divided by 2000 pounds per ton; added to the previous 11 months emissions in tons VOC	C		
I.2.b.	N/A	N/A	N/A	N/A
I.2.c.	N/A	N/A	N/A	N/A
I.2.d.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.1.	Copies of daily checks are maintained on-site.	C		
III.2.	Monthly records are maintained on-site.	C		
IV.1.	Copies of deviation reports are maintained on-site. N/A	C		
IV.2.	Copies of annual reports are maintained on-site. N/A	C		
IV.3.	Copies of semi-annual reports are maintained on-site.	C		
V.1.	Monthly calculation of pounds VOC per ton of sand emission factor multiplied by the tons of sand used, and divided by 2000 pounds per ton; added to the previous 11 months emissions in tons VOC	C		
V.2.	Emissions testing if required.	C		

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I. Significant Emissions Unit ID [4 characters]: F017

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: F019 F018?

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?"	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: F019

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: F020

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: K002

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?"	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other ¹ (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1. 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit	Record keeping requirements and formulation data or USEPA Method 24	C		
I.1. 20% opacity as a 6-minute average	Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60, as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rules 3745-17-03, if required	C		
I.1. 0.551 lb/hr of particulate emissions	Calculations E = maximum coating solids usage rate (in lbs/hr) X (1-TE) X (1-CE), where E = particulate matter emissions rate (lbs/hr), TE = transfer efficiency, CE = control efficiency	C		
I.2.a.	N/A	C		
II.	N/A	C		
III.1.	Monthly records will be maintained on-site.	C		
III.2.	Daily records will be maintained on-site	C		
IV.1.	Copies of any notifications of non-complying coatings will be maintained on-site.	C		
IV.2.	Copies of any notifications identifying when the dry filtration is not in service and the unit was in operation will be maintained on-site.	C		
V.1.	Record keeping requirements and formulation data or USEPA Method 24	C		
V.2.	Test Method 9 as set forth in	C		

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	"Appendix on Test Methods" in 40 CFR, Part 60, as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rules 3745-17-03, if required			
V.3.	<p>Calculations</p> <p>$E = \text{maximum coating solids usage rate (in lbs/hr)} \times (1-TE) \times (1-CE)$, where E = particulate matter emissions rate (lbs/hr), TE = transfer efficiency, CE = control efficiency</p>	C		
VI.	N/A	N/A	N/A	N/A

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- I. Significant Emissions Unit ID [4 characters]: K005 – This unit has been removed
- J. Provide for each term and condition in Part III (A) “State and Federally Enforceable Section” for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
N/A – Unit removed from service.				

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I. Significant Emissions Unit ID [4 characters]: K006

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1. 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit	Record keeping requirements and formulation data or USEPA Method 24	C		
I.1. 20% opacity as a 6-minute average	Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60, as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rules 3745-17-03, if required	C		
I.1. 1.91 lbs/hr of particulate emissions	Calculations E = maximum coating solids usage rate (in lbs/hr) X (1-TE) X (1-CE), where E = particulate matter emissions rate (lbs/hr), TE = transfer efficiency, CE = control efficiency	C		
I.2.a.	N/A	C		
II.1.	N/A	C		
III.1.	Monthly records will be maintained on-site.	C		
III.2.	Daily records will be maintained on-site	C		
IV.1.	Copies of any notifications of non-complying coatings will be maintained on-site.	C		
IV.2.	Copies of any notifications identifying when the dry filtration is not in service and the unit was in operation will be maintained on-site.	C		
V.1.	Record keeping requirements and formulation data or USEPA Method 24	C		

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V.2.	Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60, as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rules 3745-17-03, if required	C		
V.3.	Calculations E = maximum coating solids usage rate (in lbs/hr) X (1-TE) X (1-CE), where E = particulate matter emissions rate (lbs/hr), TE = transfer efficiency, CE = control efficiency	C		
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: K007

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	C		
I.2.a.	Records that identify each liquid organic material employed and whether or not the material is photochemically reactive.	C		
II.	N/A	N/A	N/A	N/A
III.1.	N/A	C		
IV.1.	Copies of any notifications of non-complying coatings will be maintained on-site.	C		
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: K008

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	C		
I.2.a.	Records that identify each liquid organic material employed and whether or not the material is photochemically reactive.	C		
II.	N/A	N/A	N/A	N/A
III.1.	N/A	C		
IV.1.	Copies of any notifications of non-complying coatings will be maintained on-site.	C		
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: K009

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1. 10 lbs/hr of VOC	Record keeping. Emission testing in accordance with USEPA Method 25, if required	C		
I.1. 30 tpy of VOC based upon a rolling, 12-month summation	Record keeping requirements and formulation data or USEPA Method 24	C		
I.2.a.	N/A	C		
I.2.b.	N/A	C		
II.	N/A	N/A	N/A	N/A
III.1.	Copies of daily records will be maintained.	C		
III.2.	Copies of monthly records will be maintained.	C		
III.3.	Copies of records will be maintained.	C		
IV.1.	Copies of monthly notifications will be maintained.	C		
IV.2.	Copies of deviation reports will be maintained.	C		
IV.3.	Copies of deviation reports will be maintained.	C		
IV.4.	Copies of annual reports will be maintained.	C		
V.1.	Record keeping. Emission testing in accordance with USEPA Method 25, if required	C		
V.2.	Record keeping requirements and formulation data or USEPA Method 24	C		
VI.	N/A	N/A	N/A	N/A

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- I. Significant Emissions Unit ID [4 characters]: P020
- J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
I.2.b.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: P033

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1. 0.020 lb of particulate emissions per mmBtu of actual heat input	Multiplying the maximum hourly fuel flow rate (mmscf/hr) by the AP-42 particulate emission factor (1.9 lbs or particulate emissions per mmscf) and dividing the product by the maximum heat input (mmBtu/hr). Emissions testing if required.	C		
I.1. 20% opacity as a 6-minute average	If required, Visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)	C		
I.2.	N/A	N/A	N/A	N/A
II.1.	N/A	C		
III.1.	Records will be maintained of the type and quantity of any fuel burned other than natural gas.	C		
IV.1.	Copies of any deviation reports when fuel is burned that is other than natural gas.	C		
V.1.	Multiplying the maximum hourly fuel flow rate (mmscf/hr) by the AP-42 particulate emission factor (1.9 lbs or particulate emissions per mmscf) and dividing the product by the maximum heat input (mmBtu/hr). Emissions testing if required.	C		
V.2.	If required, Visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)	C		
VI.	N/A	N/A	N/A	N/A

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I. Significant Emissions Unit ID [4 characters]: P901

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1. 50 lbs/hr of particulate emissions	Particulate emission testing as required.	C		
I.1. 20% opacity as a 6-minute average	Visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)	C		
I.2.a.	N/A	C		
II.1.	N/A	I	Report submitted April, July, and October of 2005 and January 2006	
II.2.	N/A	I	Report submitted April, July, and October of 2005 and January 2006	
III.1.	N/A	I	Report submitted April, July, and October of 2005 and January 2006	
III.2.	N/A	I	Report submitted April, July, and October of 2005 and January 2006. Malfunction reported via email dated December 7, 2005.	
III.3.	N/A	C	Report submitted April, July, and October of 2005 and January 2006	
IV.1.	N/A	C	Report submitted April, July, and October of 2005 and January 2006	
IV.2.	N/A	C		
V.1.	N/A	C		
V.2.	N/A	C		

VI.	N/A	N/A	N/A	N/A
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- K. Any other material information that may indicate non-compliance with one or more of the above-described applicable requirements for this facility must be described below:

None

Compliance Certification Section V - Responsible Official Signature Statement

Complete this section of the form only once for the facility.

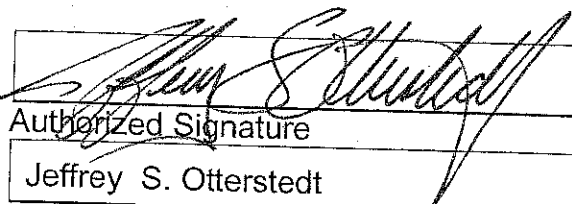
Signature for Title V Compliance Certification:

This statement shall be signed by a responsible official as defined in OAC rule 3745-77-01(GG).

Making of any false material statement, representation or certification constitutes a violation of ORC 3704.05(H), and subjects the responsible party signing this statement to civil and/or criminal penalties as provided in ORC 3704.06(C) and ORC 3704.99(B).

CERTIFICATION:

I, being the individual specified in OAC rule 3745-77-03(D), hereby affirm that, based on information and belief formed after reasonable inquiry, the statements made in this Title V Compliance Certification, which I signed on this [29] day of [April], [2005] are true, accurate and complete to the best of my knowledge.

	4-26-06
Authorized Signature	Date
Jeffrey S. Otterstedt	
Name (Please Print or Type)	
Vice President/General Manager	
Title (Please Print or Type)	

Note: A copy of this Title V Compliance Certification (Sections I through V) for the preceding calendar year must be submitted by April 30 or the date specified in General Term and Condition Part I.A.12.d to both the Director of the Ohio Environmental Protection Agency c/o the appropriate Ohio EPA District Office or local air agency and the Administrator of the United States Environmental Protection Agency c/o Director, Air and Radiation Division, U.S. EPA Region 5, 77 W. Jackson Blvd., R-19J, Chicago, Illinois 60604. It is recommended that these compliance certifications be sent by certified mail to both parties.

Instructions and clarifications for the Ohio EPA Title V Compliance Certification Form

Software requirements: This form is being issued for use with WordPerfect 6.1 or greater compatible software. If you find that this form is not compatible with your word processing software, then you will need to retype the form for your software's use.

Word Processing Instructions: This form is designed utilizing "tables" in the word processing software. The first thing the user should do is to save a complete clean copy of this form. Once you start to complete the form it should be fairly straight forward. When you get to the table portion of the form, you simply continue to add rows by selecting and clicking onto "Table" then select and click onto "insert" then select and click onto "row." This process will add a new row for you to complete. You continue to add rows until you are finished with that part of the form. Section IV of this form will require you to copy and paste a clean copy of the form for each significant emissions unit. You simply complete the form for the first emissions unit. After you are finished you need to go to your clean form and highlight the text in the form beginning with the dotted line above the initial paragraph "I. Significant Emissions Unit ID [4 characters]:" through the last paragraph "K. Any other material information ..." and press your "control" button and "c" in order to copy. You then return to the end of your initially completed Part IV form and you press your "control" button and "v" to paste a blank portion of the form onto the completed portion. You are now ready to complete the second significant emissions unit. You repeat this process until all the significant emissions units are reported.

After you have fully completed the forms, you will need to print out an original and have your "Responsible Official" sign the certification (Section V). A copy of the entire form needs to be sent to both Ohio EPA and U.S. EPA as instructed in Section V.

Clarifying Instructions:

Compliance Certification Section I

- C. The Facility ID ten digit number can be found on the first page of your final Title V permit.
- D. Date of Title V Permit Issuance can be found on the first page of your final Title V permit.
- E. Reporting Period (usually the preceding calendar year) The initial period that you are required to certify compliance for after you have been issued your initial Title V permit is from the date the permit was issued final until the end of December of that same year. Obviously, you are required to certify compliance for the entire preceding calendar year for succeeding years that you are required to operate under a Title V permit or a subsequent Title V permit application shield.

Compliance Certification Section II

- F. Ohio EPA realizes that a number of the General Terms and Conditions found in Part I.A. are explanatory in nature, and do not impose any affirmative compliance obligations on the permittee. The permittee's compliance status expressed in Section II of this form should be

based only on those General Terms and Conditions which impose an affirmative obligation of compliance upon the permittee.

The general requirement in Part I. A. 6. of the Title V Permit requiring compliance with "all terms and conditions of this permit" is directed only at terms and conditions which are both state and federally enforceable.

In order to avoid duplicative reporting of excursions/deviations, if excursions/deviations of a state and federally enforceable term and condition are reported elsewhere on the certification form, the table in Section II of the form may be completed by simply identifying Part I. A. 6. and stating "See information provided for specific terms and conditions in the following sections."

Compliance Certification Section III

G. Compliance Certification Tables

1. A Title V Permit may impose either "continuous" or "intermittent" (e.g., daily, weekly, or monthly) compliance monitoring methods as a means of determining compliance with emission limitations, control measures, work practice standards or operational restrictions appearing in Part III.A.I or II. The specific compliance monitoring and/or test method(s) used to determine compliance should be identified as the "Method Used to Determine Compliance" with such emission limitations, control measures, etc.
2. Ohio EPA has determined that a facility may use a "C" to designate "continuous" compliance with emission limitations, control measures, work practice standards, or operational restrictions under the following circumstances:
 - a. If the compliance monitoring method is itself continuous and no deviations occurred during the reporting period. If the Title V permit requires a permittee to use continuous monitoring and recording equipment (such as a CEM or COM) to determine compliance with emission limitations, control measures, work practice standards, or operational restrictions, the permittee will have to review the information generated by the device to determine if compliance with the emission limitation was continuous.
 - b. If a facility is utilizing an intermittent compliance monitoring and record keeping method (such as daily or weekly baghouse checks or daily or weekly visible particulate emission observations), the permittee may designate continuous compliance when each such monitoring event demonstrates full compliance with the applicable emission limitation, control measure, work practice standard, or operational restriction, and the permittee has no knowledge or information indicating noncompliance during the reporting period.

Each designation of "I" must include a summary of the deviation(s) or reference to Deviation report(s) submitted to the Ohio EPA District Office or Local Air Agency in the "Excursions/Deviations" section of the table.

3. If the Title V Permit requires a permittee to determine compliance with an emission limitation by the use of compliant coatings and/or the use of record keeping and calculations (e.g., the calculation of a daily volume-weighted average VOC content, or the calculation of emissions based on a fuel's sulfur content), the permittee may designate "continuous" compliance when the permittee's records and calculations accurately document and substantiate the following:
 - a. the use of nothing but compliant coatings, such that continuous compliance with the relevant emission limitation is actually achieved; or
 - b. the use of types and amounts of, e.g., VOC-containing or sulfur-containing materials, such that continuous compliance with the relevant emission limitation is actually achieved.
4. With respect to intermittent monitoring, record keeping, and/or reporting activities required by the Title V permit (e.g., conducting weekly pressure drop readings, submitting quarterly reports), the permittee need not address the "Method Used to Determine Compliance". The permittee may simply state "N/A" in this section. However, the permittee must indicate "I" or "C" in the "Continuous (C) or Intermittent (I) Compliance?" section of the table. Any excursions/deviations from such requirements must be identified in the "Excursions/Deviations" section of the table.
5. With respect to insignificant emissions units listed in Part II.A of the Title V permit, the permittee may indicate Continuous (C) compliance if all IEUs were in compliance with all applicable requirements during the reporting period.

If compliance was intermittent for one or more IEUs during the reporting period, the permittee must list the noncomplying IEU(s) along with the method(s) used to determine compliance and the required "Excursion/Deviation" information for each such

Regardless of the compliance status of the IEU(s), the permittee must maintain records supporting the conclusion(s) cited in this compliance certification in accordance with the record keeping retention requirements specified in General Term and Condition Part I.A. and OAC rule 3745-77-07(A)(3)(b)(ii). Note that deviations for any IEUs must be identified quarterly and/or semi-annually, as appropriate, in accordance with the General Terms and Conditions or in accordance with any specific PTI provisions.

6. The permittee need not certify compliance for a permit term or condition that is included for clarification or information purposes only or does not yet apply to the facility (e.g., an option under a MACT Standard prior to the compliance deadline established in the MACT). Although the permittee must list the permit term, the permittee need not address the "Method Used to Determine Compliance" and "Continuous (C) or Intermittent (I) Compliance?" sections of the form. The permittee may simply state "N/A" in these sections.

H. "Any Other Material Information":

Completion of the section titled "Any other material information that may indicate non-compliance with one or more of the above-described applicable requirements for this emissions unit must be described below needs to be clarified. First, because of the extensive monitoring, record keeping, and reporting required in the Title V permits, we do not expect to find many applicants reporting additional "material information" that indicates noncompliance beyond the data obtained from monitoring required by the permit conditions. It likely does not exist. However, you are required to consider, identify, and address such additional material information in your annual compliance certification if it does exist, even if the data obtained from monitoring activities required by the permit indicate compliance. An example of this would be a non-required, in-house stack test of a significant emissions unit to ensure that the control system is functioning properly. If this testing would indicate that the mass emission level exceeded the allowed emission level, then you would be required to report this event as material information that may indicate noncompliance with the applicable emission limitation.

Compliance Certification Section IV

- I. This is the 4-character identification for each significant emissions unit that can be found in your Title V permit such as: P001, B001, K001, etc.

J. Compliance Certification Table

1. A Title V Permit may impose either "continuous" or "intermittent" (e.g., daily, weekly, or monthly) compliance monitoring methods as a means of determining compliance with emission limitations, control measures, work practice standards or operational restrictions appearing in Part III.A.I or II. The specific compliance monitoring and/or test method(s) used to determine compliance should be identified as the "Method Used to Determine Compliance" with such emission limitations, control measures, etc.
2. Ohio EPA has determined that a facility may use a "C" to designate "continuous" compliance with emission limitations, control measures, work practice standards, or operational restrictions under the following circumstances:
 - a. If the compliance monitoring method is itself continuous and no deviations occurred during the reporting period. If the Title V permit requires a permittee to use continuous monitoring and recording equipment (such as a CEM or COM) to determine compliance with emission limitations, control measures, work practice standards, or operational restrictions, the permittee will have to review the information generated by the device to determine if compliance with the emission limitation was continuous.
 - b. If a facility is utilizing an intermittent compliance monitoring and record keeping method (such as daily or weekly baghouse checks or daily or weekly visible particulate emission observations), the permittee may designate continuous compliance when each such monitoring event demonstrates full compliance with the applicable emission limitation, control measure, work practice standard, or operational restriction, and the permittee has no knowledge or information indicating noncompliance during the reporting period.

Each designation of "I" must include a summary of the deviation(s) or reference to Deviation report(s) submitted to the Ohio EPA District Office or Local Air Agency in the "Excursions/Deviations" section of the table.

3. If the Title V Permit requires a permittee to determine compliance with an emission limitation by the use of compliant coatings and/or the use of record keeping and calculations (e.g., the calculation of a daily volume-weighted average VOC content, or the calculation of emissions based on a fuel's sulfur content), the permittee may designate "continuous" compliance when the permittee's records and calculations accurately document and substantiate the following:
 - a. the use of nothing but compliant coatings, such that continuous compliance with the relevant emission limitation is actually achieved; or
 - b. the use of types and amounts of, e.g., VOC-containing or sulfur-containing materials, such that continuous compliance with the relevant emission limitation is actually achieved.
4. With respect to intermittent monitoring, record keeping, and/or reporting activities required by the Title V permit (e.g., conducting weekly pressure drop readings, submitting quarterly reports), the permittee need not address the "Method Used to Determine Compliance". The permittee may simply state "N/A" in this section. However, the permittee must indicate "I" or "C" in the "Continuous (C) or Intermittent (I) Compliance?" section of the table. Any excursions/deviations from such requirements must be identified in the "Excursions/Deviations" section of the table.
5. The permittee need not certify compliance for permit term or condition that is included for clarification or information purposes only. Although the permittee must list the permit term, the permittee need not address the "Method Used to Determine Compliance" and "Continuous (C) or Intermittent (I) Compliance?" sections of the table. The permittee may simply state "N/A" in these sections.

A. "Any Other Material Information"

Completion of the section titled "Any other material information that may indicate non-compliance with one or more of the above-described applicable requirements for this emissions unit must be described below needs to be clarified. First, because of the extensive monitoring, record keeping, and reporting required in the Title V permits, we do not expect to find many applicants reporting additional "material information" that indicates noncompliance beyond the data obtained from monitoring required by the permit conditions. It likely does not exist. However, you are required to consider, identify, and address such additional material information in your annual compliance certification if it does exist, even if the data obtained from monitoring activities required by the permit indicate compliance. An example of this would be a non-required, in-house stack test of a significant emissions unit to ensure that the control system is functioning properly. If this testing would indicate that the mass emission level exceeded the allowed emission level, then you would be required to report this event as material information that may indicate noncompliance with the applicable emission limitation.

Examples:

A completed Ohio EPA Title V Compliance Certification Form is provided at www.epa.state.oh.us/dapc/title_v. We recommend that you take the time to study this completed example. This should provide you with insight on the minimum amount of information that is necessary to satisfactorily complete this compliance certification requirement.

If you should have any additional questions, after reviewing the examples and these instructions, please feel free to contact Mike Ahern at this E-mail address mike.ahern@epa.state.oh.us or at 614/644-3631.